



Law Offices

**Apruzzese, McDermott, Mastro & Murphy**

25 Independence Boulevard, Warren, N.J. 07059

www.ammm.com

Apruzzese, McDermott,  
Mastro & Murphy, P.C.  
(Established 1965)

Kyle J. Trent, Esq.  
ktrent@ammm.com

February 13, 2024

**Via CM/ECF**

Honorable Julien Xavier Neals, U.S.D.J.  
United States District Court - District of New Jersey  
MK Jr. Federal Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

***Re: James R. Baucum, D.O. v. Rutgers University, The State University of New Jersey, et al.; Civil Action No.: 2:23-cv-20707-JXN-JSA***

Dear Judge Neals:

As you are aware, this office represents Defendants RWJBarnabas Health and Jersey City Medical Center in the above-referenced matter.

I write to request a two-day extension of time, until **Tuesday, February 20, 2024**, for Defendants to file their reply brief in further support of their pending motion to dismiss.

That motion is currently returnable on February 20, 2024, and Defendants' reply is currently due on Friday, February 16, 2024, following the Court's Order granting an extension for Plaintiff's opposition to this motion. ECF Nos. 24 & 25.

Plaintiff's counsel, Brent Pohlman, Esq., graciously consents to this extension request.

If the foregoing meets with the Court's approval, Defendants respectfully request that this letter be "so ordered."

Respectfully submitted,

Kyle J. Trent

cc: Counsel of Record (via Electronic Filing)